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**PRELIMINARY ASSESSMENT/
VISUAL SITE INSPECTION**

**VAN WATERS & ROGERS FACILITY
SCHAUMBURG, ILLINOIS**

ILD 000 819 938

FINAL REPORT

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Prepared for

**U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Waste Programs Enforcement
Washington, DC 20460**

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EXECUTIVE SUMMARY

Dynamac Corporation (Dynamac) performed a preliminary assessment and visual site inspection (PA/VSI) to identify and assess the likelihood of releases from solid waste management units (SWMU) and other areas of concern (AOC) at the Van Waters & Rogers, Inc. (VWR), facility in Schaumburg, Illinois. This summary highlights the results of the PA/VSI and the potential releases of hazardous wastes or hazardous constituents from SWMUs and AOCs identified. In addition, a completed U.S. Environmental Protection Agency (EPA) Preliminary Assessment Form (EPA Form 2070-12) is included in Attachment A to assist in prioritization of RCRA facilities for corrective action.

The VWR facility is a wholesale chemical warehouse and distribution center. The facility supplies industrial chemicals to off-site customers. VWR does not conduct any on-site treatment or disposal activities, or manufacturing or processing activities at the facility. The majority of the wastes managed at the facility consist of a variety of hazardous waste solvents generated by off-site customers. On an intermittent basis, the facility also manages damaged or off-specification products that cannot be returned to the manufacturer or sold as downgraded products.

The hazardous waste solvents managed at the facility in 1991 included spent 1,1,1-trichloroethane (TCA) (F001, F002); spent methylene chloride (F002); spent flammable liquid with mineral spirits and TCA (F002); spent flammable liquid with glycol ethers (F002); spent flammable liquid with trichlorotrifluoroethane (F002); spent oil with combustible liquid (F002); spent perchloroethylene (F001); spent flammable liquid with acetone and tetrachloroethylene (PCE) (F001, F003, D001, D039); spent hazardous waste liquid with trichlorofluoromethane (F001); spent flammable liquid with toluene and xylene (F003, F005); spent flammable liquid with acetone and toluene (D001, F003, F005); waste combustible liquid with polyalkaline glycol and oil (D001); waste flammable liquid with isophthalic acid and 1-methoxy-2-propanol (D001); waste flammable liquid with aliphatic naphtha (D001); waste flammable liquid with oil (D001); and waste flammable liquid with isopropanol (D001). Dynamac notes the wastes codes listed above are those assigned by the facility; some of these wastes were likely to have exhibited an ignitable characteristic (D001). VWR last managed damaged or off-specification product waste at the facility in 1988; during that year, the facility managed unused TCA (U226) as hazardous waste.

McKesson Chemical Company (McKesson) began operations at this location in 1980. VWR purchased McKesson and the facility in 1986. The facility currently employs approximately 21 persons, 7 of whom work in the warehouse area. The facility consists of a single building of approximately 50,500 square feet, an adjoining 11,100-square-foot outdoor raw material storage area along the east side of the building, and a 12,600-square-foot parking lot along the south side of the building. The facility is currently regulated as a transporter and RCRA Interim Status storage facility. According to Jim Hooper, Regulatory Manager, VWR, the facility plans to undergo RCRA closure of its interim status Container Storage Area (SWMU 1) prior to November 1992.

The PA/VSI identified the following two SWMUs at the facility:

1. Container Storage Area
2. Warehouse Storage Area

The PA/VSI did not identify any AOCs at the facility.

The potential for a release to the ground water, surface water, on-site soils, and the air from either SWMU is low. SWMU 1 is located outside in the northeast corner of the concrete outdoor raw material storage area. The unit consists of a designated 384-square-foot portion of the concrete pad and stores waste in closed 55-gallon drums and 350-gallon portable steel containers. The unbermed concrete pad has no visible cracks and slopes toward a closed drain located in the center of the outdoor raw material storage area. SWMU 2 consists of a 200-square-foot concrete area located inside the warehouse on a concrete floor with no floor drains and manages waste on an intermittent basis in closed containers. There is no history of documented releases at the facility.

Ground water in the area of the facility is not used as an industrial or drinking water source. According to Dave Varner, Utilities Superintendent, Schaumburg Department of Public Works, the City of Schaumburg obtains its drinking water from Lake Michigan; there are no active ground water wells in the city. However, the city does maintain seven bedrock ground water wells for emergency backup, should they be necessary. The nearest of these wells is located one mile northeast and upgradient of the facility, and draws from a confined deep bedrock aquifer. A release to ground water would not be likely to impact any human or environmental receptors.

The nearest surface water body, Salt Creek, is located about three-quarter mile northeast of the facility. Salt Creek is used for fishing, as well as for some industrial uses. Industrial uses for Salt Creek include non-contact cooling water discharge and treated sanitary water discharge. Salt Creek is not used for drinking water purposes. Other surface water bodies in the area include numerous intermittent streams, and an approximately 15-acre man made pond located about one-half mile north of the facility.

The nearest wetland consists of a seasonally flooded marsh area approximately 10 acres in size. This wetland is located approximately one-eighth mile northwest of the facility. There are numerous other seasonally and semi-permanently flooded wetlands ranging in size from approximately two acres to twenty-five acres which are located within two miles of the facility.

Access to the facility's outdoor raw material storage area, where the Container Storage Area (SWMU 1) is located, is controlled by an eight-foot high chain-link fence. The facility's warehouse and office area are closed structures with locking doors. The nearest residences are located approximately two-thirds of a mile northeast of the facility. The

nearest school, Harper College, is located approximately one mile northwest of the facility. The nearest primary school, Twinbrook School, is located approximately one and one-quarter miles south of the facility. There are three other schools located within two miles of the facility.

Dynamac recommends VWR complete RCRA closure of the Container Storage Area (SWMU 1) according to an approved closure plan prior to November 8, 1992.

1.0 INTRODUCTION

PRC Environmental Management, Inc. (PRC), received Work Assignment No. C05087 from the U.S. Environmental Protection Agency (EPA) under Contract No. 68-W9-0006 (TES 9) to conduct preliminary assessments (PA) and visual site inspections (VSI) of hazardous waste treatment and storage facilities in EPA Region 5. PRC assigned Dynamac Corporation (Dynamac), its TES 9 subcontractor, to conduct the PA/VSI for the Van Waters & Rogers, Inc. (VWR), facility in Schaumburg, Illinois.

As part of the EPA Region 5 Environmental Priorities Initiative, the RCRA and CERCLA programs are working together to identify and address RCRA facilities that have a high priority for corrective action using applicable RCRA and CERCLA authorities. The PA/VSI is the first step in the process of prioritizing facilities for corrective action. Through the PA/VSI process, enough information is obtained to characterize a facility's actual or potential releases to the environment from solid waste management units (SWMU) and areas of concern (AOC).

A SWMU is defined as any discernible unit at a RCRA facility in which solid wastes have been placed and from which hazardous constituents might migrate, regardless of whether the unit was intended to manage solid or hazardous waste.

The SWMU definition includes the following:

- RCRA-regulated units, such as container storage areas, containers, surface impoundments, waste piles, land treatment units, landfills, incinerators, and underground injection wells
- Closed and abandoned units
- Recycling units, waste water treatment units, and other units that EPA has generally exempted from standards applicable to hazardous waste management units
- Areas contaminated by routine and systematic releases of wastes or hazardous constituents. Such areas might include a wood preservative drippage area, a loading-unloading area, or an area where solvent used to wash large parts has continually dripped onto soils.

An AOC is defined as any area where a release to the environment of hazardous waste or constituents has occurred or is suspected to have occurred on a non-routine and nonsystematic basis. This includes any area where such a release in the future is judged to be a strong possibility.

The purpose of the PA is as follows:

- Identify SWMUs and AOCs at the facility.
- Obtain information on the operational history of the facility.
- Obtain information on releases from any units at the facility.
- Identify data gaps and other informational needs to be filled during the VSI.

The PA generally includes review of all relevant documents in files located at state offices and at the EPA Region 5 office in Chicago.

The purpose of the VSI is as follows:

- Identify SWMUs and AOCs not discovered during the PA.
- Identify releases not discovered during the PA.
- Provide a specific description of the environmental setting.
- Provide information on release pathways and the potential for releases to each medium.
- Confirm information obtained during the PA regarding operations, SWMUs, AOCs, and releases.

The VSI includes interviewing appropriate facility staff, inspecting the entire facility to identify all SWMUs and AOCs, photographing all SWMUs, identifying evidence of releases, initially identifying potential sampling locations, and obtaining all information necessary to complete the PA/VSI report.

This report documents the results of the PA/VSI of the VWR facility located in Schaumburg, Illinois, EPA ID No. ILD 000 819 938. The PA was completed on March 25, 1992. Dynamac gathered and reviewed information from files at the Division of Land Pollution Control and the Division of Water Pollution Control at the Illinois Environmental Protection Agency (IEPA) Springfield, Illinois, office and from EPA Region 5 RCRA files. In addition, Dynamac gathered information from maps published by the U.S. Geological Survey (USGS) and the U.S. Department of the Interior (USDI).

Joseph Weslock and Deborah Hall of Dynamac conducted the VSI on April 8, 1992. The VSI included an interview with James Hooper, Regulatory Manager, and John Tobin, Area Operations Manager, both of VWR. The VSI also included a walk-through inspection of the facility. Dynamac identified two SWMUs and no AOCs during the PA/VSI. Dynamac completed EPA Form 2070-12 using information gathered during the PA/VSI. This form is included in Attachment A. The VSI is summarized along with 1 inspection photograph in Attachment B. Field notes from the VSI are included in Attachment C.

2.0 FACILITY DESCRIPTION

This section describes the facility's location, past and present operations (including waste management practices), waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors.

2.1 FACILITY LOCATION

The VWR facility is located at 2055 Hammond Drive in Schaumburg, Cook County, Illinois (latitude 42° 04' 00" N and longitude 88° 02' 18" W) (McKesson, 1980c), as shown in Figure 1. The facility occupies approximately two and three-quarter acres of land in an industrial park.

The VWR facility is bordered on the west by Hammond Drive, on the east by a low-lying, grassy area, on the north by the A.I.T. Company, and on the south by the Seivert Corporation.

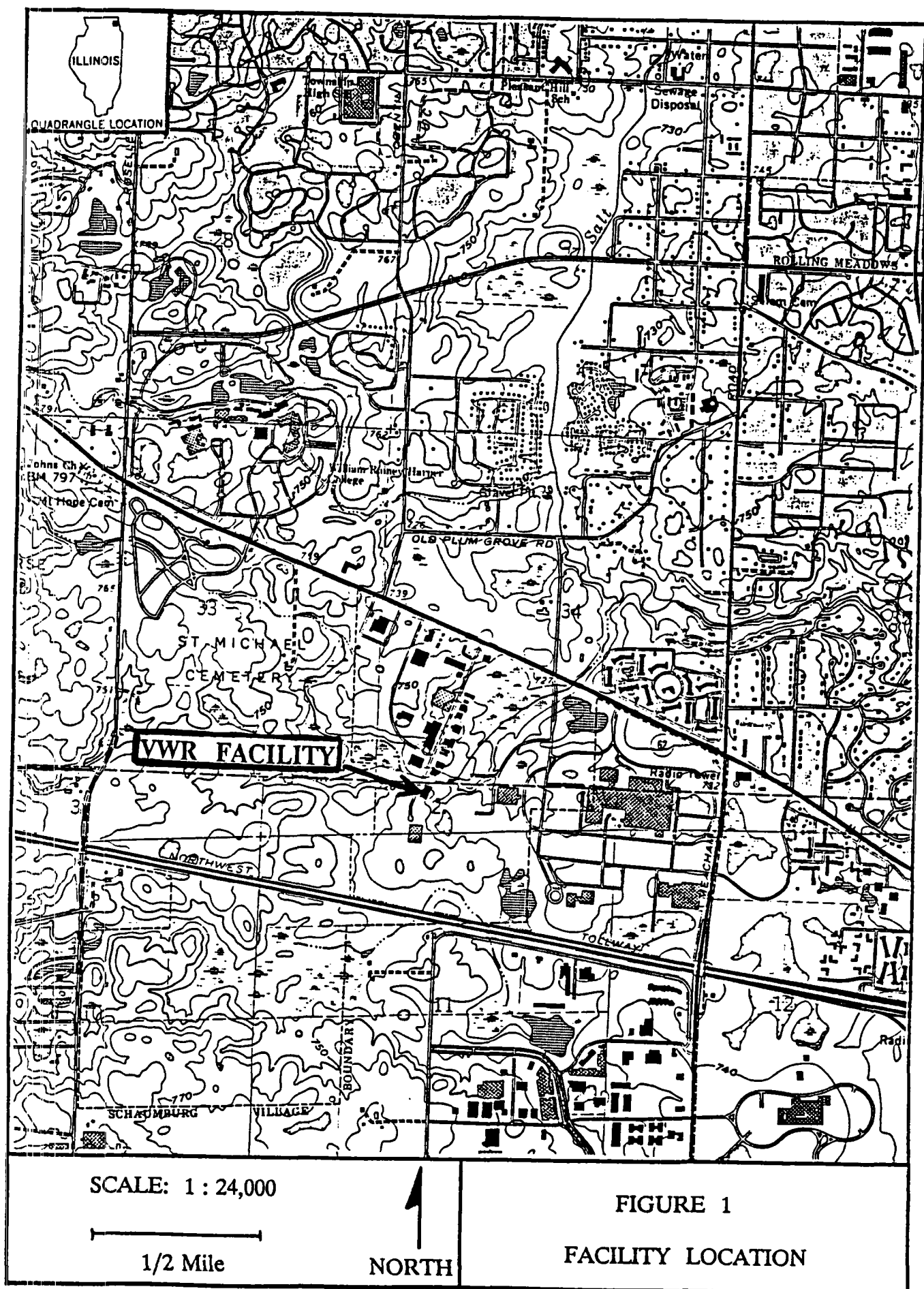
2.2 FACILITY OPERATIONS

The VWR facility is a wholesale chemical warehouse and distribution center. The facility supplies industrial chemicals to off-site customers. In addition, VWR accepts, stores, and transports certain hazardous waste solvents generated by off-site customers. Wastes managed at the facility consist of a variety of waste solvents generated by off-site customers and damaged or off-specification products that cannot be returned to the manufacturer or sold as downgraded products. The type of hazardous waste solvents and damaged or off-specification products which are managed as wastes by the facility varies depending on the needs of the facility's customers. VWR does not conduct any on-site treatment or disposal activities, or manufacturing or processing activities at the facility.

In 1980, the McKesson Chemical Company built the facility and began chemical warehousing and distribution operations. Prior to the construction of the warehouse the land was used for agricultural purposes. In November 1986, VWR purchased the McKesson Chemical Company and this facility. There were no operational changes.

The facility currently employs approximately 21 persons, 7 of whom work in the warehouse area. The facility occupies an approximately two and three-quarter-acre parcel which includes a single building of approximately 50,500 square feet, and an adjoining 11,100-square-foot outdoor raw material storage area along the east side of the building. There is a 12,600-square-foot parking lot along the south side of the building. The outdoor raw material storage area is surrounded by an eight-foot high chain-link fence (See Photo No. 1).

The facility's waste streams are managed in two SWMUs. Waste solvents are stored outside in the Container Storage Area (SWMU 1). Damaged or off-specification products which are managed as wastes by the facility are stored indoors in the Warehouse Storage Area (SWMU 2). Facility SWMUs are identified in Table 1. The facility layout, including SWMU locations, is shown in Figure 2.



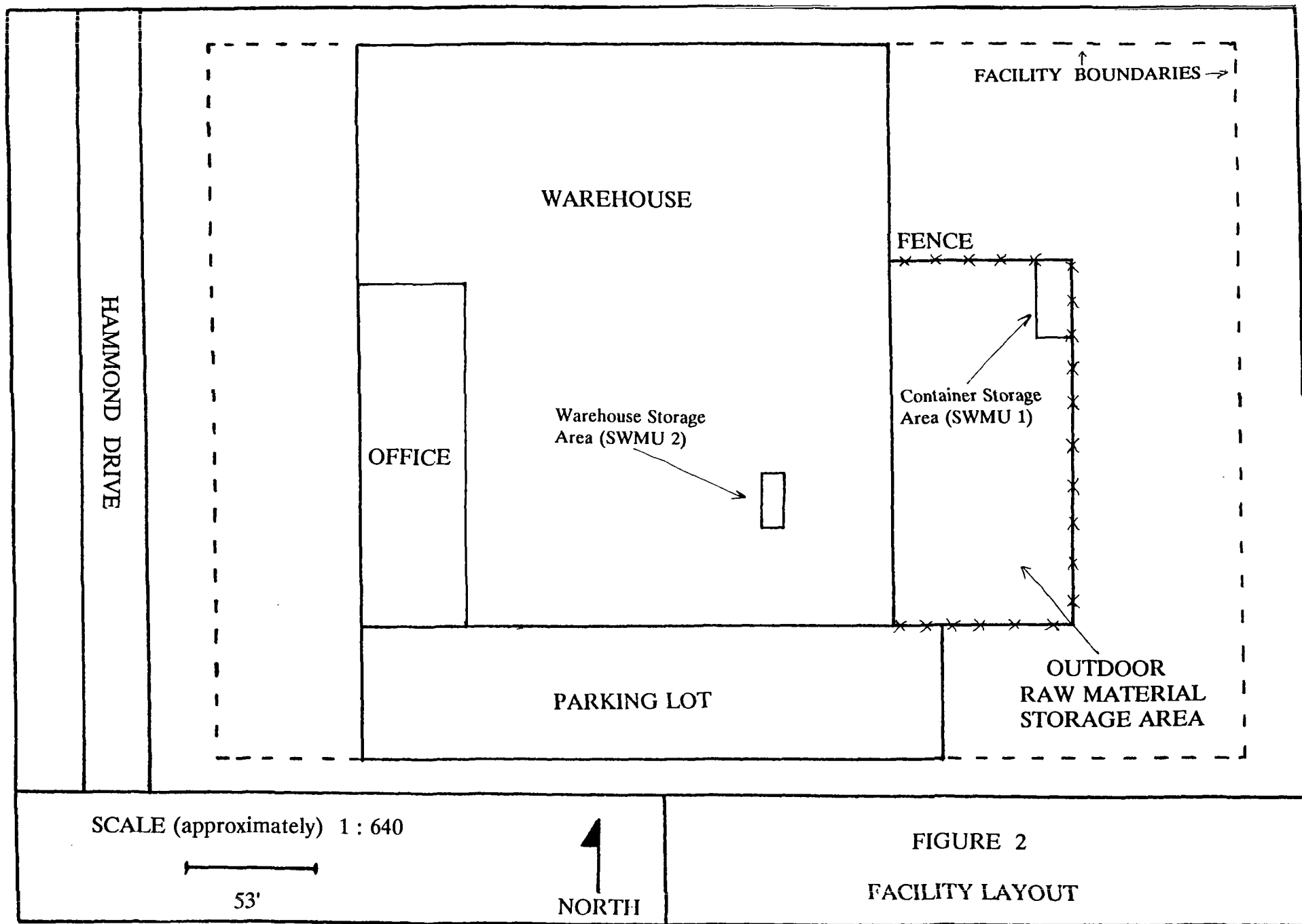
Source: modified from USGS, 1961

TABLE 1
SOLID WASTE MANAGEMENT UNITS (SWMU)

SWMU Number	SWMU Name	RCRA Hazardous Waste Management Unit*	Status
1	Container Storage Area	Yes	Active for greater than 90-day storage of hazardous waste
2	Warehouse Storage Area	No	Active for storage of nonhazardous waste and less than 90-day storage of hazardous waste**

* A RCRA hazardous waste management unit is one that currently requires or formerly required submittal of a RCRA Part A or Part B permit application.

** Although this unit has not been used to manage waste since 1988, this unit remains active to manage damaged and off-specification product waste as it is generated.



Source: modified from VWR, undated

2.3 WASTE GENERATING PROCESSES

The primary waste stream managed at the VWR facility is hazardous waste solvent generated off site by VWR customers. VWR collects and manages the hazardous waste solvents as a service to its customers. The hazardous waste solvents managed at the facility can be grouped into three categories: waste chlorinated solvents, waste non-chlorinated solvents, and waste ignitable solvents. On an intermittent basis, the facility also generates waste consisting of damaged or off-specification products that cannot be returned to the manufacturer or sold as downgraded products. Wastes managed at the facility are discussed below and are summarized in Table 2. Annual generation rates presented for the hazardous waste solvents are based on 1991 waste generation data. The facility last managed damaged or off-specification products as a waste in 1988; annual generation rates presented for this waste are based on 1988 waste generation data.

VWR transports hazardous waste solvents from off-site customers in 55-gallon drums and 350-gallon portable containers, and stores the wastes in the Container Storage Area (SWMU 1) prior to shipment off site for disposal. The volume of each hazardous waste solvent managed by the VWR facility varies depending on the customer's waste generation rate. During 1991, VWR managed a total of 21,861 gallons of hazardous waste solvents at the facility (VWR, 1992). In addition to its own trucks, VWR uses numerous off-site carriers to transport these wastes from the facility to a variety of licensed Treatment, Storage, Disposal (TSD) facilities. The carriers VWR uses most frequently include Burren Transfer Company in Elgin, Illinois; Chem Freight in Cleveland, Ohio; GSX Chemical Services, Inc., in Columbia, South Carolina; HazMat Environmental Group, Inc., in Buffalo, New York; M C Tank Transport in Hamilton, Ohio; Metropolitan Environmental, Inc., in Celina, Ohio; and Schneider Tank Lines in Green Bay, Wisconsin.

In 1991, the VWR facility stored a total of 3,500 gallons of waste chlorinated solvents in the Container Storage Area (SWMU 1). This volume included 1,090 gallons of spent 1,1,1-trichloroethane (TCA) (F001, F002); 605 gallons of spent methylene chloride (F002); 110 gallons of spent flammable liquid with mineral spirits and TCA (F002); 220 gallons of spent flammable liquid with glycol ethers (F002); 100 gallons of spent flammable liquid with trichlorotrifluoroethane (F002); 55 gallons of spent oil with combustible liquid (F002); 770 gallons of spent perchloroethylene (F001); 440 gallons of spent flammable liquid with acetone and tetrachloroethylene (PCE) (F001, F003, D001, D039); and 110 gallons of spent hazardous waste liquid with trichlorofluoromethane (F001) (VWR, 1992). Dynamac notes the waste codes listed are those assigned by the facility; some of these wastes were likely to have exhibited an ignitable characteristic (D001). Waste chlorinated solvents are primarily transported off site by one of the above-mentioned carriers to a TSD facility owned by Chemical Waste Management in West Carrollton, Ohio, for fuel blending or recycling.

TABLE 2
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Generation Rate^a</u>	<u>Source</u>	<u>Primary Management Unit ^b</u>
<u>Waste Chlorinated Solvents</u>			
Spent TCA/F001,F002	1090 gallons	Off-Site Customers	1
Spent Methylene Chloride/ F002	605 gallons	Off-Site Customers	1
Spent Flammable Liquid with Mineral Spirits and TCA/ F002	110 gallons	Off-Site Customers	1
Spent Flammable Liquid with Glycol Ethers/F002	220 gallons	Off-Site Customers	1
∞ Spent Flammable Liquid with Trichlorotrifluoroethane/ F002	100 gallons	Off-Site Customers	1
Spent Oil with Combustible Liquid/F002	55 gallons	Off-Site Customers	1
Spent Perchloroethylene/ F001	770 gallons	Off-Site Customers	1
Spent Flammable Liquid with Acetone and PCE/F001, F003, D001, D039	440 gallons	Off-Site Customers	1
Spent Hazardous Waste Liquid with Trichlorofluoromethane/ F001	110 gallons	Off-Site Customers	1

^a Generation rates are based on the quantity of waste managed at the facility in 1991.

^b Primary management unit refers to the SWMU that currently manages or formerly managed the waste.

TABLE 2 (continued)
SOLID WASTES

<u>Waste/EPA Waste Code</u>	<u>Generation Rate^a</u>	<u>Source</u>	<u>Primary Management Unit ^b</u>
<u>Waste Non-Chlorinated Solvents</u>			
Spent Flammable Liquid with Toluene and Xylene/F003, F005	4,504 gallons	Off-Site Customers	1
Spent Flammable Liquid with Acetone and Toluene/D001, F003, F005	3,737 gallons	Off-Site Customers	1
<u>Waste Ignitable Solvents</u>			
Combustible Liquid with Polyalkaline Glycol and Oil/D001	2,550 gallons	Off-Site Customers	1
Flammable Liquid with Isophthalic Acid and 1-Methoxy-2-Propanol/D001	1,045 gallons	Off-Site Customers	1
Flammable Liquid with Aliphatic Naphtha/D001	275 gallons	Off-Site Customers	1
Flammable Liquid with Oil/D001	4,235 gallons	Off-Site Customers	1
Flammable Liquid with Isopropanol/D001	2,015 gallons	Off-Site Customers	1
<u>Damaged and Off-Specification Product Waste</u>			
Unused TCA/U226	55 gallons	Damaged or Off-Specification Product	2

^a Generation rates are based on the quantity of waste managed at the facility in 1991, with the exception of the damaged and off-specification product waste, which was last managed at the facility in 1988.

^b Primary management unit refers to the SWMU that currently manages or formerly managed the waste.

In 1991, the VWR facility stored a total of 8,241 gallons of waste non-chlorinated solvents in the Container Storage Area (SWMU 1). This volume included 4,504 gallons of spent flammable liquid with toluene and xylene (F003, F005) and 3,737 gallons of spent flammable liquid with acetone and toluene (D001, F003, F005) (VWR, 1992). Dynamac notes the waste codes listed for these wastes are those assigned by the facility; some of these wastes were likely to have exhibited an ignitable characteristic (D001). Waste non-chlorinated solvents are primarily transported off site by one of the above-mentioned carriers to the Laidlaw Environmental Services (Laidlaw) facility in Pecatonica, Illinois. This facility serves as a transfer station for the wastes; these wastes are either incinerated, recycled, or fuel blended.

In 1991, the VWR facility stored a total of 10,120 gallons of waste ignitable solvents at the Container Storage Area (SWMU 1) including 2,550 gallons of combustible liquid with polyalkaline glycol and oil (D001); 1,045 gallons of flammable liquid with isophthalic acid and 1-methoxy-2-propanol (D001); 275 gallons of flammable liquid with aliphatic naphtha (D001); 4,235 gallons of flammable liquid with oil (D001); and 2,015 gallons of flammable liquid with isopropanol (D001) (VWR, 1992). Waste ignitable solvents are primarily transported off site by one of the aforementioned carriers to a TSD facility owned by Systech in Pauling, Ohio, for fuel blending.

Damaged product is generated at the facility when containers of product are damaged during shipping or warehouse operations. Off-specification product is generated when a product does not meet the standards required for its use and/or the product is not sold in a timely manner. Damaged or off-specification products which cannot be returned to the manufacturer or sold as downgraded products are managed as wastes by the facility. The damaged and off-specification product waste, both hazardous and nonhazardous, is managed in the Warehouse Storage Area (SWMU 2), located in the southeast corner of the warehouse. The facility generates this waste only intermittently. There was no waste being managed in this unit at the time of the VSI, and the facility did not manage any waste at this unit in 1991. The last time the facility used this unit to manage damaged and off-specification product waste was in 1988. During 1988, the facility stored one 55-gallon drum of unused TCA (U226) as waste for less than 90 days at SWMU 2 prior to transporting the waste off site. Safety-Kleen Corporation transported the waste to its TSD facility in Dolton, Illinois, for recycling.

When the facility manages a nonhazardous damaged and off-specification product waste at this unit, the facility uses one of the previously mentioned carriers to transport the waste off site to the TSD facility owned by Laidlaw in Pecatonica, Illinois. This TSD facility serves as a transfer station for the waste.

2.4 HISTORY OF DOCUMENTED RELEASES

There was no history of documented releases at the facility available in federal, state, or facility files at the time of the PA/VSI.

2.5 REGULATORY HISTORY

On August 14, 1980, McKesson submitted a Notification of Hazardous Waste Activity (Notification) identifying the facility as a generator and transporter of hazardous wastes (McKesson, 1980a). On November 10, 1980, McKesson submitted a subsequent Notification identifying the facility as a generator, transporter, and storage facility (McKesson, 1980b). On November 13, 1980, McKesson submitted a Part A Interim Status Permit Application (Part A) identifying the facility as a storage facility. The Part A identified a Container Storage Area (SWMU 1) located in the north east corner of the facility's outdoor raw material storage area and stated the facility annually stored a total of 261,000 pounds of F001 waste; 70,000 pounds of F003 waste; and 37,000 pounds of F005 waste (McKesson, 1980c).

On October 31, 1986, when VWR purchased McKesson and the facility, VWR submitted a subsequent Notification identifying the facility as a generator and transporter of hazardous wastes (VWR, 1986a). On that same date, VWR submitted a revised Part A identifying the facility as a storage facility. The revised Part A identified the facility's Container Storage Area (SWMU 1) as having a container storage capacity (S01) of 6,600 gallons. The revised Part A indicated the facility annually stored a total of 55,000 pounds of F001 waste; 55,000 pounds of F002 waste; 250,000 pounds of F003 waste; 10,000 pounds of F005 waste; and 50,000 pounds of D001 waste (VWR, 1986b). The facility is currently regulated as a transporter and RCRA Interim Status storage facility.

According to James Hooper of VWR, the facility plans to undergo RCRA closure of the Container Storage Area (SWMU 1) by November 1992. However, the facility did not have an approved closure plan at the time of the VSI. The Warehouse Storage Area (SWMU 2) does not require RCRA closure as it has never been used to store waste for greater than 90 days.

In the past, the VWR facility had some RCRA compliance problems. These violations, observed during a series of IEPA inspections between 1982 and 1988, pertained mainly to deficiencies in paperwork such as contingency plans, waste analysis plans, and inspection logs (IEPA, 1982, 1986a, 1986b, and 1988a). In addition, the facility received a Notice of Violation (NOV) during a 1988 inspection for failing to identify contents and to mark accumulation dates on all containers entering storage (EPA, 1988). The facility resolved the NOV and other violations; there were no apparent violations at the facility during a 1990 IEPA inspection (IEPA, 1988b, 1990).

The facility is not currently required to have any air permits or a National Pollutant Discharge Elimination System permit, and there are no underground storage tanks at the facility. There is no history of complaints about the facility, nor has there been any Superfund activity at the facility.

2.6 ENVIRONMENTAL SETTING

This section describes the climate, flood plain and surface water, geology and soils, and ground water in the vicinity of the VWR facility.

2.6.1 Climate

The VWR facility is located approximately 10 miles northwest of O'Hare International Airport, the nearest National Weather Service office. The climate in this area is continental with cold winters and warm summers. Lake Michigan, located about 18 miles east of the facility, has a moderating influence on temperature extremes. The average annual daily temperature is 49.2° fahrenheit (F). The highest average daily temperature is 73.0° F in July, and the lowest average daily temperature is 21.4° F in January. Mean annual precipitation is 33.34 inches (NOAA, 1990). Mean annual lake evaporation is approximately 30 inches and net annual precipitation is approximately 3 inches. The one-year 24-hour maximum rainfall is approximately 2.4 inches (NOAA, 1979). Average wind speed and direction is west-southwest at 10 miles per hour. The wind is strongest in April, at an average speed of 12 miles per hour from the west-southwest (NOAA, 1990).

2.6.2 Flood Plain and Surface Water

The VWR facility is located in an area of minimal flooding outside the 100-year flood plain of any surface water body (FEMA, 1982). The nearest surface water body is Salt Creek, located about three-quarters mile northeast of the facility (USGS, 1961). Salt Creek is used for fishing, as well as for some industrial uses. Industrial uses for Salt Creek include non-contact cooling water discharge and treated sanitary water discharge. Salt Creek is not used for drinking water (IEPA, 1992).

Surface water drainage at the west half of the facility is toward a storm drain in a ditch along Hammond Avenue which discharges to the sanitary sewer. Surface water drainage at the east half of the facility is toward a swale located east of the facility which extends to a 10-acre wetland approximately one-quarter mile northeast of the facility. Surface water runoff from the outdoor raw material storage area and SWMU 1 is collected by a closed drain located in the center of the area (USDI, undated). All floor drains located indoors at the facility discharge to the sanitary sewer.

Other surface water bodies within two miles of the facility include numerous intermittent streams, and a 15-acre manmade pond located approximately one-half mile north of the facility (USDI, undated). A representative of the Schaumburg City Hall stated most ponds in the area are used for fishing, but could not be specific about the aforementioned pond (SCH, 1992).

The nearest wetland consists of a 10-acre seasonally flooded marsh area. The area is located approximately one-eighth mile northwest of the facility. There are numerous other seasonally and semi-permanently flooded ponds and marshes which vary in size from 5 to 15 acres located within two miles of the facility (USDI, undated).

2.6.3 Geology and Soils

The soils of the VWR facility are mapped as Grays silt loam and Sawmill silty clay loam. Grays silt loam is a deep, moderately well drained, moderately permeable soil formed on outwash plains. Sawmill silty clay loam is a deep, poorly drained, moderately permeable soil formed in alluvial material along upland drainageways (SCS, 1979).

The surficial deposits in the area around the VWR facility are mapped as glacial deposits of Wadsworth Till forming the Valparaiso Moraine. The Wadsworth Till is a gray clayey till with few cobbles and boulders (Lineback, 1979). Other till units as well as sands and gravels may underlie the Wadsworth Till. The surficial deposits at the VWR facility are approximately 165 feet in thickness (Willman, 1971).

The bedrock underlying the glacial deposits at the VWR facility is Silurian-age Edgewood Dolomite, which is the basal formation of the Silurian dolomite in Illinois and consists of white, gray, or tan dolomite which becomes increasingly shaley near the base. This dolomite is approximately 50 feet thick. Underlying the dolomite is the Ordovician-age Maquoketa Shale. The Maquoketa Shale is red and oolitic near the top, and gray green, with some interbedded shaley limestone, with increasing depth. The Maquoketa Shale is approximately 200 feet thick. Underlying the Maquoketa Shale are several thousand feet of Ordovician-age and Cambrian-age limestones and sandstones (Willman, 1971).

2.6.4 Ground Water

No ground water information specific to the VWR facility was available at the time of the PA/VSI. There is no available information on possible aquifers in the surficial unconsolidated deposits. There are two bedrock aquifers underlying the region of the VWR facility: a shallow bedrock aquifer and a deep bedrock aquifer. The shallow bedrock aquifer is the Silurian dolomite. This aquifer is an artesian aquifer that leaks upwards in much of the area because the overlying clayey till is an imperfect confining layer. Regional ground-water flow in this area is east and southeast and measured hydraulic conductivities average 1×10^{-4} centimeters per second. The deep bedrock aquifer underlies the Maquoketa Shale and comprises the Ordovician-age and Cambrian-age dolomites and sandstones. The Maquoketa shale serves as a confining layer over the deep bedrock aquifer (Hughes, Kraatz, and Landon, 1966). Ground-water flow direction in the deep bedrock aquifer is regionally to the east (Schicht, Adams, and Stall, 1976).

According to Dave Varner, Utilities Superintendent, Schaumburg Department of Public Works, the City of Schaumburg maintains seven ground water wells for emergency backup, should they become necessary. The nearest of these wells is located one mile northeast of the facility and draws from sandstone in the confined deep bedrock aquifer. Each of the other of these wells draws from limestones and sandstones in the deep bedrock aquifer at depths ranging from about 500 feet to 1,800 feet (SDPW, 1992).

2.7 RECEPTORS

The VWR facility occupies approximately two and three-quarter acres in an industrial area in Schaumburg, Illinois, which had a 1991 population of 68,586 persons (SCH, 1992).

The facility is bordered on the west by Hammond Drive, on the east by a low lying, grassy area, on the north by the A.I.T. Company, and on the south by the Seivert Corporation. The nearest residences are located approximately two-thirds of a mile northeast of the facility. The nearest school, Harper College, is located approximately one mile northwest of the facility. The nearest primary school, Twinbrook School, is located approximately one and one-quarter miles south of the facility. There are three other schools located within two miles of the facility (USGS, 1961). Access to the facility's outdoor raw material storage area, where the Container Storage Area (SWMU 1) is located, is controlled by an eight-foot high chain-link fence. The facility's warehouse and office area are closed structures with locking doors.

The nearest surface water body, Salt Creek, is located about three-quarters of a mile northeast of the facility (USGS, 1961). Salt Creek is used for fishing, as well as for some industrial uses. Industrial uses for Salt Creek include non-contact cooling water discharge from various facilities and treated sanitary water discharge (IEPA, 1992). Salt Creek is not used for drinking water purposes (SDPW, 1992). Other surface water bodies in the area include numerous intermittent streams, and an approximately 15-acre manmade pond located approximately one-half mile north of the facility (USDI, undated). A representative from Schaumburg City Hall stated most ponds in the area are used for fishing, but could not be specific about the aforementioned pond (SCH, 1992).

Ground water in the area of the facility is not used as an industrial or drinking water source. According to Dave Varner, Utilities Superintendent, Schaumburg Department of Public Works, the city maintains seven ground water wells for emergency backup; the nearest of these wells is located one mile northeast of the facility and draws from a confined deep aquifer (SDPW, 1992). There is no recharge to the confined aquifer from the ground surface in this area. Therefore a release to ground water would not be likely to impact any human receptors.

The nearest downgradient wetlands include two seasonally flooded marsh areas approximately two acres each in size. These wetlands are located approximately one-eighth of a mile southeast of the facility. The nearest upgradient wetlands include a seasonally flooded marsh area located one-eighth of a mile northwest of the facility and a semi-permanently flooded marsh area located one-quarter of a mile northeast of the facility. These two wetlands are approximately 15 acres each in size. In addition, there are numerous seasonally and semi-permanently flooded ponds within two miles of the facility (USGS, 1961; USDI, undated). There is a potential for a release to ground water to impact the nearby downgradient wetlands.

3.0 SOLID WASTE MANAGEMENT UNITS

This section describes the two SWMUs identified during the PA/VSI. The following information is presented for each SWMU; description of the unit, dates of operation, wastes managed, release controls, history of documented releases, and Dynamac's observations. Figure 2 shows the SWMU locations.

SWMU 1

Container Storage Area

Unit Description: The Container Storage Area is located outside in the northeast corner of the concrete outdoor raw material storage area; the entire outdoor raw material storage area is fenced (See Photo No. 1). The unit consists of a 384-square-foot portion of the concrete pad and is used to store hazardous waste solvents generated off site by VWR customers. The unit has a capacity to store up to 6,600 gallons of waste in 55-gallon drums and 350-gallon steel portable containers. The unbermed concrete pad is sloped toward a closed drain located in the center of the outdoor raw material storage area.

Date of Startup: This unit began operation in 1981.

Date of Closure: This unit is active. The facility plans to undergo RCRA closure of this unit by November 1992, but did not have an approved closure plan at the time of the VSI.

Wastes Managed: The unit manages a variety of hazardous waste solvents generated off site by VWR customers including spent TCA (F001, F002); spent methylene chloride (F002); spent flammable liquid with mineral spirits and TCA (F002); spent flammable liquid with glycol ethers (F002); spent flammable liquid with trichlorotrifluoroethane (F002); spent combustible liquid with oil (F002); spent perchloroethylene (F001); spent flammable liquid with acetone and PCE (F001, F003, D001, D039); spent hazardous waste liquid with trichlorofluoromethane (F001); spent flammable liquid with toluene and xylene (F003, F005); spent flammable liquid with acetone and toluene (D001, F003, F005); combustible liquid with polyalkaline glycol and oil (D001); flammable liquid with isophthalic acid and 1-methoxy-2-propanol (D001); flammable liquid with aliphatic naphtha (D001); flammable liquid with oil (D001); and flammable liquid with isopropanol (D001) (VWR, 1992). Dynamac notes the wastes codes listed above are those assigned by the facility; some of these wastes were likely to

have exhibited an ignitable characteristic (D001). Wastes are either transported off site for fuel blending or recycling, or are transported off site to a transfer station, which transports the waste to an appropriate TSD facility.

Release Controls: This unit stores waste in closed containers located on an unbermed concrete pad that slopes toward a closed drain. There are no other release controls associated with this unit.

History of Documented Releases: There is no history of documented releases at this unit.

Observations: Dynamac observed a concrete pad labeled "HAZARDOUS WASTE ONLY" in the northeast corner of the outdoor raw material storage area (See Photo No. 1). The unit contained six 55-gallon drums of hazardous waste and seven empty 350-gallon portable steel containers; all containers in the unit appeared to be sealed and in sound condition during the VSI. The 55-gallon drums were labeled and dated.

SWMU 2 Warehouse Storage Area

Unit Description: The Warehouse Storage Area consists of a 200-square-foot area located on a concrete floor inside the warehouse (photo not available). Wastes managed by this unit are damaged or off-specification products that cannot be returned to the manufacturer or sold as downgraded products. There are no floor drains in the area of this unit.

Date of Startup: This unit began operation in 1981.

Date of Closure: This unit is currently active for storage of nonhazardous wastes and less than 90-day storage of hazardous wastes.

Wastes Managed: This unit manages damaged or off-specification products that cannot be returned to the manufacturer or sold as downgraded products. The facility generates this type of waste only intermittently. The facility last used this unit to manage waste in 1988. During 1988, the facility managed one 55-gallon drum of unused TCA (U226).

Release Controls: This unit manages waste indoors in closed containers located on a concrete floor with no floor drains.

History of

Documented Releases: There is no history of documented releases at this unit.

Observations:

Dynamac observed a metal rack with three shelves in this unit (photo not available). There was no visible evidence of any stain or spills on the concrete floor in the area of the unit. At the time of the VSI, the unit did not contain any waste.

4.0 AREAS OF CONCERN

Dynamac did not identify any AOCs at the VWR facility during the PA/VSI. The facility is relatively new; all product storage areas have sound containment and there is no history of documented releases at the facility.

5.0 CONCLUSIONS AND RECOMMENDATIONS

The PA/VSI identified two SWMUs and no AOCs at the VWR facility. Background information on the facility's location, operations, waste generating processes, history of documented releases, regulatory history, environmental setting, and receptors is presented in Section 2.0. SWMU-specific information, such as the unit's description, dates of operation, wastes managed, release controls, history of documented releases, and observed condition, is discussed in Section 3.0. Dynamac did not identify any AOCs at the facility during the PA/VSI. Following are Dynamac's conclusions and recommendations for each SWMU. Table 3 identifies the SWMUs at the VWR facility and recommended further actions.

SWMU 1 Container Storage Area

Conclusions: The Container Storage Area is a 384-square-foot portion of the concrete outdoor raw material storage area (See Photo No. 1). This unit is used to store waste material from off site customers in closed 55-gallon drums and 350-gallon steel portable containers. The concrete pad is fenced and slopes toward a closed drain located in the center of the outdoor raw material storage area.

Due to the release controls described above, the unit has a low potential for release to ground water, surface water, on-site soils, and air.

Recommendations: The facility does not plan to submit a Part B Permit Application (Part B). Because EPA has required all facilities which have interim status to either undergo RCRA closure of all hazardous waste management units or have an effective Part B by November 8, 1992, Dynamac recommends VWR conduct RCRA closure of this unit according to an approved closure plan prior that date.

SWMU 2 Warehouse Storage Area

Conclusions: The Warehouse Storage Area consists of a 200-square-foot area located on a concrete floor inside the warehouse (photo not available). Wastes are managed in closed containers at this unit; the waste consists of damaged or off-specification products that cannot be returned to the manufacturer or sold as downgraded products. There are no floor drains in the area of this unit.

Due to the release controls described above, the unit has a low potential for a release to ground water, surface water, on-site soils, and air.

Recommendations: Dynamac recommends no further action for this SWMU.

TABLE 3
SWMU SUMMARY

<u>Solid Waste Management Unit</u>	<u>Operational Dates</u>	<u>Evidence of Release</u>	<u>Suggested Further Action</u>
1. Container Storage Area	1981 to present	None	Conduct RCRA closure according to an approved closure plan
2. Warehouse Storage Area	1981 to present	None	None

ENFORCEMENT
CONFIDENTIAL

REFERENCES

- Federal Emergency Management Agency (FEMA), 1982. Flood Insurance Rate Map, Village of Schaumburg, Illinois.
- Hughes, Kraatz, and Landon, 1966. "Bedrock Aquifers of Northeastern Illinois," Illinois State Geological Survey, Circular No. 406.
- Illinois Environmental Protection Agency (IEPA), 1982. Letter to Dan Gallagher, McKesson Chemical Company (McKesson), regarding deficiencies recorded during a March 1982 IEPA inspection, from Ken Bechely, Field Operations Section, IEPA, May 7.
- IEPA, 1986a. RCRA Inspection Report for McKesson prepared by Caroline Panico, IEPA, March 25.
- IEPA, 1986b. RCRA Inspection Report for McKesson (follow-up inspection) prepared by Caroline Panico, IEPA, July 15.
- IEPA, 1988a. Inspection Report for Van Waters and Rogers, Inc. (VWR), prepared by John Maher, IEPA, February 18.
- IEPA, 1988b. Letter to John Pesek, VWR, regarding resolution of facility violations, from Angela Tin, Division of Land Pollution Control, IEPA, June 10.
- IEPA, 1990. Letter to Gerard Anastasia, VWR, regarding May 24, 1990 IEPA inspection, from William Radlinski, Division of Land Pollution Control, IEPA, June 20.
- IEPA, 1992. Telephone conversation between Ahmad Abvlaban, Water Pollution Control Division, IEPA, and Valerie Farrell, Dynamac Corporation (Dynamac), regarding surface water use of Salt Creek and Des Plaines Lake, May 13.
- Lineback, J.A., 1979. Quaternary Deposits in Illinois, Map, 1:500,000 scale.
- McKesson, 1980a. Notification of Hazardous Waste Activity (Notification), August 14.
- McKesson, 1980b. Subsequent Notification, November 10.
- McKesson, 1980c. Part A Permit Application (Part A), November 13.
- National Oceanic and Atmospheric Administration (NOAA), 1979. Climatic Atlas of the U.S., Ashville, NC.
- NOAA, 1990. Local Climatological Data for O'Hare International Airport, Illinois.

REFERENCES (continued)

- Schaumburg City Hall (SCH), 1992. Telephone conversation between a Switchboard Operator, SCH, and Deborah Hall, Dynamac regarding Schaumburg population and surface water use, May 1.
- Schaumburg Department of Public Works (SDPW), 1992. Telephone conversation between Dave Varner, Utilities Superintendent, Schaumburg Department of Public Works, and Deborah Hall, Dynamac, regarding ground water use, May 1.
- Schicht, Adams, and Stall, 1976. Water Resources Availability, Quality, and Cost in Northeastern Illinois, Illinois Geological Survey Report of Investigation No. 83.
- Soil Conservation Service (SCS), 1979. Soil Survey of DuPage County and Portions of Cook County, Illinois, May.
- U.S. Department of the Interior (USDI), undated. National Wetlands Inventory Map, 1:24,000 scale, Palatine, Illinois Quadrangle.
- U.S. Environmental Protection Agency (EPA), 1988. Notice of Violation to McKesson from February 18, 1988, IEPA inspection, April 12.
- U.S. Geological Survey (USGS), 1961. 7.5 Minute Series Topographic Map, Palatine, Illinois Quadrangle, 1:24,000, Photorevised 1972 and 1980.
- VWR, undated. Diagram of the facility layout indicating the location of the office, warehouse, and outdoor raw material storage area.
- VWR, 1986a. Subsequent Notification, October 31.
- VWR, 1986b. Revised Part A, October 31.
- VWR, 1992. 1991 Hazardous Waste Report for IEPA prepared by Stacey Damiani, ChemCare Coordinator, VWR, February 20.
- Willman, 1971. "Summary of the Geology of the Chicago Area," Illinois State Geological Survey, Circular No. 460.

ATTACHMENT A

EPA PRELIMINARY ASSESSMENT FORM 2070-12



POTENTIAL HAZARDOUS WASTE SITE
PRELIMINARY ASSESSMENT
PART 1 - SITE INFORMATION AND ASSESSMENT

I. IDENTIFICATION
01 STATE 02 SITE NUMBER
IL ILD000819938

II. SITE NAME AND LOCATION

01 SITE NAME (Legal, common, or descriptive name of site) Van Waters and Rogers, Inc.	02 STREET, ROUTE NO., OR SPECIFIC LOCATION IDENTIFIER 2055 Hammond Drive
03 CITY Schaumburg	04 STATE 05 ZIP CODE 06 COUNTY 07 COUNTY CODE 08 CONG DIST IL 60173 Cook
09 COORDINATES LATITUDE 42 04 00	LONGITUDE 088 02 18.0

10 DIRECTIONS TO SITE (Starting from nearest public road)

Algonquin Road (Rt. 62) to Hammond Drive. South on Hammond Drive about 1/4 mile. Facility is on east side of Hammond Drive.

III. RESPONSIBLE PARTIES

01 OWNER (If different) Same as above.	02 STREET (Business, mailing, residential)
03 CITY	04 STATE 05 ZIP CODE 06 TELEPHONE NUMBER ()
07 OPERATOR (If shown and different from owner)	08 STREET (Business, mailing, residential)
08 CITY	10 STATE 11 ZIP CODE 12 TELEPHONE NUMBER ()
13 TYPE OF OWNERSHIP (Check one) <input checked="" type="checkbox"/> A. PRIVATE <input type="checkbox"/> B. FEDERAL (Agency name) <input type="checkbox"/> C. STATE <input type="checkbox"/> D. COUNTY <input type="checkbox"/> E. MUNICIPAL <input type="checkbox"/> F. OTHER: (Specify) <input type="checkbox"/> G. UNKNOWN	

14 OWNER/OPERATOR NOTIFICATION ON FILE (Check all that apply)

☒ A. RCRA 301 (a) DATE RECEIVED: 08/14/80 ☐ B. UNCONTROLLED WASTE SITE (RCRA 103 (a)) DATE RECEIVED: / / ☐ C. NONE

IV. CHARACTERIZATION OF POTENTIAL HAZARD

01 ON SITE INSPECTION <input checked="" type="checkbox"/> YES DATE 04/08/92 <input type="checkbox"/> NO	BY (Check all that apply) <input type="checkbox"/> A. EPA <input checked="" type="checkbox"/> B. EPA CONTRACTOR <input type="checkbox"/> C. STATE <input type="checkbox"/> D. OTHER CONTRACTOR <input type="checkbox"/> E. LOCAL HEALTH OFFICIAL <input type="checkbox"/> F. OTHER: (Specify) CONTRACTOR NAME(S): Dynamac Corporation
---	--

02 SITE STATUS (Check one) <input checked="" type="checkbox"/> A. ACTIVE <input type="checkbox"/> B. INACTIVE <input type="checkbox"/> C. UNKNOWN	03 YEARS OF OPERATION 1981 Present <input type="checkbox"/> UNKNOWN BEGINNING YEAR ENDING YEAR
--	--

04 DESCRIPTION OF SUBSTANCES POSSIBLY PRESENT, KNOWN, OR ALLEGED
Wide variety of unused, as well as spent, chlorinated, non-chlorinated, and ignitable solvents (F001, F002, F003, F005, D001).

05 DESCRIPTION OF POTENTIAL HAZARD TO ENVIRONMENT AND/OR POPULATION

The potential for a release from the facility to impact the environment is low. There is a potential for a fire to occur at the facility due to the presence of solvents.

V. PRIORITY ASSESSMENT

01 PRIORITY FOR INSPECTION (Check one. If high or medium is checked, complete Part 2 - Waste information and Part 3 - Description of hazardous conditions and exposures) <input type="checkbox"/> A. HIGH (Inspection required promptly) <input type="checkbox"/> B. MEDIUM (Inspection required) <input checked="" type="checkbox"/> C. LOW (Inspection on site available basis) <input type="checkbox"/> D. NONE (No further action needed, complete current disposition form)

VI. INFORMATION AVAILABLE FROM

01 CONTACT Kevin Pierard	02 OF (Agency/ Organization) U.S. EPA	03 TELEPHONE NUMBER 312 886-4448
04 PERSON RESPONSIBLE FOR ASSESSMENT Joe Weslock Deborah Hall	05 AGENCY Dynamac Corp.	06 ORGANIZATION 07 TELEPHONE NUMBER 312 466-0222
		08 DATE 04/08/92 MONTH DAY YEAR

ATTACHMENT B

VISUAL SITE INSPECTION
SUMMARY AND
PHOTOGRAPHS

VISUAL SITE INSPECTION SUMMARY

Van Waters and Rogers Facility
Schaumburg, Illinois
ILD 000 819 938

Date: April 8, 1992

Facility Representatives: James Hooper, Regulatory Manager, Van Waters and Rogers, Inc. (VWR)
John Tobin, Area Operations Manager, VWR

Inspection Team: Joseph Weslock, Dynamac Corporation
Deborah Hall, Dynamac Corporation

Photographer: Joseph Weslock, Dynamac Corporation

Weather Conditions: Sunny; about 55° F

Summary of Activities: The visual site inspection (VSI) began at 9:00 a.m. with an introductory meeting. The inspection team discussed the purpose of the VSI and the agenda for the visit. Facility representatives then discussed the VWR facility's past and current operations, solid wastes generated, and release history. The inspection team gathered most of the information on a question-and-answer basis. VWR provided the inspection team with copies of the documents requested.

The VSI tour began at 9:40 a.m. The inspection team walked through the facility's warehouse to the outdoor storage area. Dynamac observed the Container Storage Area (SWMU 1), located in the northeast corner. This unit contained 6 closed 55-gallon drums of waste and 7 empty 350-gallon portable tanks. The unit was labelled "Hazardous Waste Only," and there were no visible stains. The inspection team then walked back into the warehouse where Dynamac observed the Warehouse Storage Area (SWMU 2), located in the southeast corner. This unit did not contain any waste at the time of the VSI.

Visual Site Inspection Summary
VWR Facility
April 8, 1992

The tour concluded at approximately 10:00 a.m., after which the inspection team held an exit interview with Messrs. Hooper and Tobin. The inspection team completed the VSI and left the facility at 10:10 a.m.

PHOTOGRAPHS

**VAN WATERS AND ROGERS, INC., FACILITY
SCHAUMBURG, ILLINOIS**

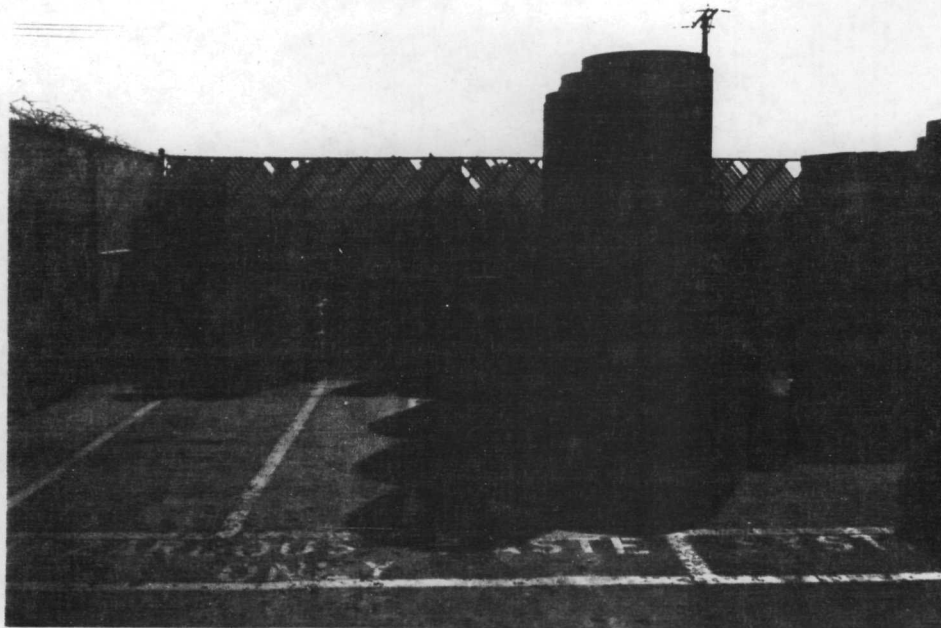


Photo No.:	1	Location:	SWMU 1
Orientation:	East	Date:	April 8, 1992
Description:	Container Storage Area located in the northeast corner of the outdoor storage area. Each of the 350-gallon portable tanks in this area were empty at the time of the VSI.		

END OF PHOTOGRAPHS

ATTACHMENT C
VISUAL SITE INSPECTION
FIELD NOTES

4/8/92

9:00 AM Van Waters & Rogers.
Sunny, Approx 55°F

Joe Westlock & Deborah Hall,
Dynamac Corp.

James P. Hooper
Regional Regulatory Mgr.

John Tobin
Area Operations Mgr.

Chemical Distribution Warehouse

UNVR is subsidiary of Union

→ watched corporate risks which
described business operations

facility purchases bulk
chemicals (mostly pesticides here)
→ re-packages / re-sells

4/8/92
This facility receives bulk
& commercial goods. Waste
is generated from receipt
of spent products (mostly
solvents) from customers.

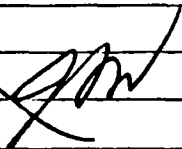
No USTs & ASTs
No Air Stacks/Permitted
only Sanitary HW

Van Wazer acquired McClellan in 1986
facility built in 1980.

No asbestos & PCB containers

No spills or releases

5169- SIC code



- + Part A 4/8/92
Notified as storage facility

uses 1 storage area

Drum + tote tanks 350-gallon
DOT steel
carbon

inspected every other year.

still under Int. Status
-> currently undergoing closure

-> will change operations to
transfer facility only.

gates, locks, no x-tra security

5 AM - 7 PM, 5 days/week

21 total people; 7 in warehouse
rest are

office makes lunch dinner

9 AM

4/8/92

no history of complaints

plant houses are Anti
across Abogongin (1 1/2 mile)

surface drainage to
sanitary/storm sewer

surface body - Motorola Lake

3 TSD used.

fuel blending - flammable solvents
Systech - Paulding, Ohio

recycling - chlorinated solvents
CWM - West Carrollton, Ohio

other -

wire treatment } Land
concretes } Laidlaw, Beatonville, IL

AM

5

4/8/92

9:40 - began walk-through

Photo 1 - Waste Storage Area

²
29 x Ft. (E)

384 Ft²

6 drums D001/F003/F005

2 drums F002

- Empty portable tanks

- concrete - no chain, concrete
walls, no stairs, no fence,
yard behind fence

surface water drain - 100 yds
front goes to retention tank

- neighbors - AIT (S)

10 AM - completed walk-through

6

4/8/72
Acetone - self-transport

request list of transporters

conclusion discussion + left
facility - 10:00 AM

gon